

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

IN RE: JOHNSON & JOHNSON	:	Civil Action No. 3:16-md-2738-FLW-LHG
TALCUM POWDER PRODUCTS	:	
MARKETING, SALES PRACTICES	:	MDL No. 2738
AND PRODUCTS LIABILITY	:	
LITIGATION	:	
	:	
	:	
<b>This Document Relates to:</b>	:	
<b>Vickie Forrest, et al.</b>	:	
	:	

**AMENDED CROSS-NOTICE OF VIDEOTAPED (REMOTE)**  
**DEPOSITION OF**  
**JOHN B. MCKEEGAN**

PLEASE TAKE NOTICE that, in connection with *Vickie Forrest v. Johnson & Johnson, et al.*, Case No. 1522-CC00419-02, in the Circuit Court of the City of St. Louis, State of Missouri, Defendants Johnson & Johnson and Johnson & Johnson Consumer Inc. (“Johnson & Johnson Defendants”), pursuant to the Federal and Missouri Rules of Civil Procedure, cross-notice the videotaped deposition upon oral examination of **John B. McKeegan**, before a person duly authorized to administer oaths, on **Monday, September 27, 2021, beginning at 10:00 a.m. EST via video conference**, pursuant to the *Amended Notice of Videotaped (Remote) Deposition of John B. McKeegan*, as served and attached as Exhibit “A” hereto.

The deposition will be conducted pursuant to the provisions of the Federal and Missouri Rules of Civil Procedure. You may appear and examine the witness following completion of the *Forrest* deposition.

Dated: September 22, 2021

*s/ Susan M. Sharko*

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*s/John H. Beisner*

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*Attorneys for Defendants Johnson &  
Johnson and Johnson & Johnson  
Consumer Inc.*

**CERTIFICATION OF SERVICE**

I hereby certify that I have, on this 22nd day of September, 2021, caused the foregoing Amended Cross-Notice of Videotaped (Remote) Deposition of John B. McKeegan to be served on all counsel of record via electronic mail, including:

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Kaitlyn E. Stone

# EXHIBIT A

**IN THE CIRCUIT COURT OF THE CITY OF ST. LOUIS  
STATE OF MISSOURI**

**VICKIE FORREST**, et al.,

Plaintiffs,

vs.

**JOHNSON & JOHNSON**, et al.,

Defendants

Case No. 1522-CC00419-02

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**PLAINTIFFS' AMENDED NOTICE OF TAKING REMOTE ORAL AND VIDEOTAPED  
TRIAL DEPOSITION OF JOHN B. MCKEEGAN**

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TO:	Counsel of Record
DATE AND HOUR:	September 27, 2021 at 10:00 a.m. EST
WITNESS TO BE DEPOSED:	John B. McKeegan
STYLE OF DEPOSITION:	Steno & Video
COURT REPORTER:	<b>Golkow Court Reporting</b>

PLEASE TAKE NOTICE that, pursuant to Rule 57 of the Missouri Rules of Civil Procedure, the Plaintiffs, by and through undersigned counsel, will conduct the remote videotaped deposition upon oral examination before a person authorized to administer oaths, of John B. McKeegan in the above-referenced matter. The deposition will be conducted remotely; a zoom link will be circulated in advance of the deposition. The deponent and all persons wishing to attend the deposition shall provide counsel for Plaintiffs with their email addresses no later than three days before the deposition. The deposition will continue day-to-day until completed.

The deposition will be videotaped before a certified court reporter from Golkow Court Reporting, 877-370-3377, and may be used for the purposes of discovery or for use by Plaintiffs as evidence at trial, or both.

Dated: September 21, 2021

**ONDERLAW, LLC**

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*Attorneys for Plaintiffs*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that this document was filed and electronically served by way of the Court's electronic filing system this 21st day of September, 2021.

/s/ W. Wylie Blair